

March 11, 2005

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Re: Review Draft of the California Water Plan Highlights

Greetings Kamyar and Paul,

I'd like to pass along my appraisal of the Draft Highlights. Overall, I'm impressed by the evolution of the message which the Highlights conveys. In particular, the "Roadmap" text on "foundational actions" (big concept!) does a good job of defining and emphasizing water use efficiency and water quality management. Although I have some caveats and clarifications regarding the Initiatives text, I think these sections are also successful.

However, it took me several readings of the Highlights to appreciate these sections because I continue to have significant misgivings regarding the introductory material on water demands and the scenarios. I realize these topics are freighted with a difficult history of Advisory Committee debate; perhaps because we're so close to the material, we miss the message which is likely to come through to other readers. The message needs to be clear and not prone to misinterpretation, and I'm not certain this will be achieved. (Have you asked outside readers for feedback on whether they understand and can interpret information in the Draft?) Here are my major concerns:

Page 2: I think the "California Water Balance" graph is ingenious. But be sure that it's clear to readers that this refers only to a subset of total State water (what we're calling "applied," and sources of applied water). Clarify whether the "wild and scenic" category includes all protected ("dedicated") environmental water.

Page 4: The scenarios combine "base conditions" such as projected population growth and land use patterns, with water management actions (responses) such as varying levels of water use efficiency, and this can be a major source of confusion for readers. The reader needs to understand that these scenarios do not represent our best efforts and opportunities for water conservation, environmental water management, and so forth—in effect, that these scenarios are steps in an incomplete process. The text could mention that additional work is needed to play out (for example) a full "high water use efficiency" scenario.

Moreover, the labels and descriptions for "less" and "more" resource intensive scenarios don't adequately explain the differences. I believe you've had suggestions from other reviewers—for example, Peter Gleick—for clearer language. Highlight the point (in "What *could* our future look like") that we expect water planners to use the strategies

(cross-reference, or visual key to another section) in response planning. Modify the last sentence of this paragraph (“DWR is preparing...”) to explain that DWR/the Bulletin will assist regional water management in developing response “strategies.”

Page 4: The sentence beginning, “In the future...” should be clearer that the future will be complicated by the changes and variability in hydrology associated with climate change (rather than “hydrologic patterns become more uncertain”). Also, in general, I’m concerned that the Highlights fails to acknowledge that not only are environmental needs inadequately understood, but there are clear situations in which known-- but not yet quantified-- needs are not met. This brings me back to the environmental water component of the scenarios: There should be acknowledgment that this is based on incomplete information, and that targets for environmental dedication could go higher.

Page 5: I note that the “demand” estimates include remedying groundwater overdraft (also mentioned on page 7 in the context of sustainability). While this is a crucial issue for sustainable water management, it’s institutionally, politically, technically, etc., complicated—and I don’t recall whether the basis for the “additional 2 maf to eliminate statewide groundwater overdraft” is explained elsewhere. So let me ask: Where will the reader of the Bulletin find information about the basis for this figure? Is it based on considerations such as cost of pumping, water quality (e.g., loss of useable supplies), environmental constraints, physical degradation of the aquifer, etc.? Does it come from Bulletin 118?

Page 6: On this page you introduce the concept of “Statewide Water Management Systems.” By the time the reader has finished page 21, this concept has been amplified to embrace a lot: local and regional infrastructure that contributes to management of water on a statewide scale, state-sponsored and/or led planning, institutional initiatives, etc. This scope is not conveyed on page 6. I have trouble with “statewide water management systems,” as distinguished from “water management systems statewide” (or “on a statewide basis”); the former sounds more top-down, SWP-like. (Your verbs, “maintain” and “improve” are more suited to physical infrastructure than to institutional efforts, but my thesaurus is running low....)

Page 18: This discussion of flood management is broader than the floodplain management “response strategy,” obviously, but it seems to me that it could reference the objectives included in that strategy. This would include wise land use planning.

Finally, I want you to know how much I appreciate your capable, dedicated, and very professional efforts on this Bulletin. Thanks for the continued review opportunities.

Yours truly,

Carolyn Yale
U.S. Environmental Protection Agency

Cc: Paul Dabbs